

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Brechbuhl, Thomas U.

Date of Appointment: 04/04/2018

Other Federal Government Positions Held During the Preceding 12 Months: None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

eSigned in FDM by:
Thomas U. Brechbuhl

User ID: [REDACTED]



04/30/2018

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations(Subject to any comments below).

eSigned in FDM by:
Sarah E. Taylor

User ID: [REDACTED]



04/30/2018

Other review conducted by

Supervisor:

eSigned in FDM by:
Sarah E. Taylor

User ID: [REDACTED]



04/30/2018

Reviewer:

eSigned in FDM by:
Sarah E. Taylor

User ID: [REDACTED]



04/30/2018

U.S. Office of Government Ethics Certification

1. Filer's Positions Held Outside United States Government

#	NAME	CITY, STATE	OG E TYPE	POSITION	FROM	TO
1	Alcentra Capital Corporation	New York, NY, USA	Business Enterprise	Director	05/2014	Present
2	Appenzeller Point LLC	Atlanta, GA, USA	Business Enterprise	General Partner	12/2012	Present
3	Avadyne Health	San Diego, CA, USA	Business Enterprise	Director	04/2016	Present
4	Board of Directors - Atlanta Area Council Boy Sco	Atlanta, GA, USA	Non-Profit Organization	Director	11/2012	Present
5	Family Trust #1	Atlanta , GA, USA	Trusts and Estates	Trustee	12/2012	Present
6	Family Trust #2	Atlanta, GA, USA	Trusts and Estates	Trustee	12/2012	Present
7	Family Trust #3	Atlanta , GA, USA	Trusts and Estates	Trustee	12/2012	Present
8	Greater Atlanta Christian School Foundation	Norcross, GA, USA	Educational Institution	Trustee	10/2013	Present
9	Qualifacts Systems Inc.	Nashville, TN, USA	Business Enterprise	Director	07/2015	Present
10	RxBenefits	Birmingham, AL, USA	Business Enterprise	Director	08/2016	Present
11	Stira Alcentra Global Credit Fund	Irvine, CA, USA	Business Enterprise	Trustee	01/2017	Present
12	West Point Society of Atlanta	Atlanta, GA, USA	Non-Profit Organization	Director	06/2008	Present

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Avadyne 401 (k)	N/A			
1.1	Vanguard Target Retirement 2030	Yes	\$50,001 - \$100,000	Dividends, Capital Gains, Interest	\$2,501 - \$5,000
2	Avadyne Health, Inc - Vested Stock Options 926 shrs @ \$1000 per shr (value is not readily ascertainable) - Expiring 8/11/2026	No			None (or less than \$201)
3	Qualifacts System, Inc stock options, (value not readily ascertainable) 3,799.51 shrs @\$100.00 - expiring 7/17/2025	N/A			None (or less than \$201)
4	RxBenefits, stock options (value not readily ascertainable) (14,827	N/A			None (or less than \$201)

shr @ \$10.00) - 58.3% vested
Expiring 8/19/26

5	Qualifacts Systems, Inc - deferred compensation: cash receivable	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	Alcentra Corporation	N/A		Income from personal services	\$100250
7	Avadyne includes	N/A		Salary	\$381548
8	Qualifacts	N/A		Income from personal services	\$30000
9	RXBenefits	N/A		Income from personal services	\$112500
10	Stira Alcentra Global Credit Fund	N/A		Income from personal services	\$61750

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR OTHER PARTY TO AGREEMENT/ARRANGEMENT	CITY, STATE	STATUS AND TERMS	DATE
1	Alcentra Capital Corporation	New York, NY, USA	Resignation: I will resign from my Board Membership and receive a prorated payment for services rendered.	05/2014
2	Avadyne Health	San Diego, CA, USA	Stock Option: Right to buy 926 Shares of Avadyne Health stock at \$1,000 a share.	08/2016
3	Avadyne Health	San Diego, CA, USA	Continuing participation in Employee Benefit Plan: I will continue to participate in Avadyne Health's 401(k) benefit plan. No further contributions will be made by Avadyne or myself.	04/2016
4	Avadyne Health	San Diego , CA, USA	Medical Insurance: I may elect to continue medical coverage for up to 1 year per company policy.	04/2016
5	Avadyne Health	San Diego, CA, USA	Employee Agreement: Serve as the Executive Chairman. I will resign my position and receive a prorated payment for services rendered.	06/2016
6	Qualifacts Systems	NASHVILLE , TN, USA	Resignation: I will resign from my position with Qualifacts System.	07/2015
7	Qualifacts Systems Inc.	Nashville, TN, USA	Cash Recieveable: Will receive \$225,000 payment that is due	01/2018

to me for services rendered whenever the privately-held company is sold.

8	Qualifacts Systems Inc.	Nashville, TN, USA	Stock Option: Right to purchase 3,799.51 shares of QSI stock at \$100 per share per the consulting agreement signed 7/2015 and amended 8/2015.	07/2015
9	Qualifacts Systems Inc.	Nashville, TN, USA	Consulting Agreement: I will terminate agreement to provide consulting services to Qualifacts Systems Inc.	07/2015
10	RxBenefits	Birmingham, AL, USA	Stock Option: Right to buy 14,827 shares at \$10.00 a share pursuant to the agreement to provide consulting services	08/2016
11	RxBenefits	Birmingham, AL, USA	Consulting Agreement: I will terminate agreement to provide consulting services to RxBenefits.	07/2016
12	RxBenefits	Birmingham, AL, USA	Resignation: I will resign from my position and receive a prorated payment for services rendered.	08/2016
13	Stira Alcentra Global Credit Fund	Irvine, CA, USA	Resignation: I will resign from my position with Stira Alcentra Global Credit Fund.	01/2017

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Alcentra Capital Corporation	New York, NY	I serve as a member of the board of directors of Alcentra Capital Corporation.
2	Avadyne Health	San Diego, CA	I serve as the Executive Chairman of the Board of Avadyne Health
3	Qualifacts Systems Inc	Nashville, TN	I serve on the board of directors of Qualifacts and provide some consulting services to the company.
4	RxBenefits	Birmingham, AL	I serve on the board of directors of RxBenefits and provide some consulting services to the company
5	Stira Alcentra GCF	Irvine, CA	I serve as an independent trustee of the Stira Alcentra Global Credit Fund

5. Spouse's Employment Assets & Income and Retirement Accounts

This report has no reported Assets

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Morgan Stanley Investment Account	N/A			None (or less than \$201)
1.1	Cash	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.2	Doubleline Total Return Bond (DBLTX)	Yes	\$250,001 - \$500,000		None (or less than \$201)
1.3	PIMCO Income Class P (PONPX)	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
1.4	Structured Note - CSCI12 Wor RTY SPX SE5E DC	N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
1.5	Structured Note - GS CI 12.15% WORSTOF RTY SPS SX	N/A	\$250,001 - \$500,000	Interest	\$2,501 - \$5,000
1.6	National-Oilwell Varco Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.7	Chevron Corp	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.8	Exxon Mobil Corp	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.9	Royal Dutch Shell A	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.10	Royal Dutch Shell PLC SPON ADR	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.11	CONOCOPHILLIPS	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.12	BASF SE ADR	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.13	Dow DuPont Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.14	Boeing Co	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.15	Northrup Grumman Corp	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.16	RAYTHEON	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.17	Johnson Controls	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
1.18	ABB LTD Zurich	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.19	Emerson Electric Co	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.20	3 M Co	N/A	\$15,001 - \$50,000		None (or less than \$201)

1.21	Siemens AG SPON ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.22	Illinois Tools Wks Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.23	AERCAP Holding N.V.	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.24	Ryanair Holdings PLC ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.25	Adient PLC	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.26	McDonald's Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.27	Starbucks Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.28	TAL Education Group	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.29	Comcast Corporation CL A	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.30	Genuine Parts	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
1.31	Target Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.32	CVS Health Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.33	Altria Group	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
1.34	British Amern TOB PLC ADR	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.35	Phillip Morris International INC	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
1.36	Kimberly Clark Corp	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
1.37	Unilever N V SHR	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.38	Danaher Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.39	Cigna Corporation	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.40	Astrazeneca PLC SPON ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.41	Eli Lilly	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.42	Johnson and Johnson	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.43	Merck and Co	N/A	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
1.44	Novartis AG ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)

1.45	Pfizer	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.46	Banco Bilbao Vizcaya ARGE	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.47	HSBC Holdings PLC ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.48	JP Morgan Chase And Company	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.49	Wells Fargo Company	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.50	Suntrust Bank	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.51	Ameriprise FI	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.52	Northern Trust Corporation	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.53	Credit Suisse Group Zuerich ADR	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.54	UBS Group AG SHS	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.55	Brighthouse FINL Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.56	METLIFE Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.57	Chubb LTD	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
1.58	Travelers COS Inc	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.59	Alphabet Inc CL A	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.60	Netease Com Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.61	Tencent Hldgs LTD Unspn ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.62	Mastercard Inc CL A	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.63	Microsoft	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.64	VMWare Inc CL A	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.65	Nintendo LTD Unsponsored ADR	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.66	Cisco Systems Inc	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.67	Apple	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.68	Logitech International SA APP	N/A	\$1,001 - \$15,000		None (or less than \$201)

1.69	Corning Inc	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.70	Broadcom LTD SHS	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.71	Intel	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.72	Qualcomm	N/A	\$1,001 - \$15,000		None (or less than \$201)
1.73	Taiwan Semicon Manufacturing	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.74	AT & T	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.75	BCE	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
1.76	NIPPON Teleg & Tel Corp SPONS	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.77	Nextera Energy	N/A	\$50,001 - \$100,000		None (or less than \$201)
1.78	HCP INC REIT	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.79	Welltower	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.80	Booking Holdings	N/A	\$15,001 - \$50,000		None (or less than \$201)
1.81	MS CIAUTO 12% ON INDU SPX SX5E	N/A	\$100,001 - \$250,000		None (or less than \$201)
1.82	Energy MLP Income Fund, LP	N/A	\$250,001 - \$500,000		None (or less than \$201)
1.83	Carlye GMS Finance Inc	N/A	\$500,001 - \$1,000,000		None (or less than \$201)
1.84	PE Premier Carlyle Energy Credit Opportunities II ONSH FDR LP	N/A	\$100,001 - \$250,000		None (or less than \$201)
2	Fulcrum Equity Partners II	Yes	\$250,001 - \$500,000	Dividends, Capital Gains	\$100,001 - \$1,000,000
3	Fulcrum Equity Partners III	Yes	\$100,001 - \$250,000	Dividends, Capital Gains	\$201 - \$1,000
4	Hycroft Advisors Specialty Bank New York, NY	N/A	\$100,001 - \$250,000		None (or less than \$201)
5	Stockhorn LLC - Durable Digtale Medical Equipment Indianapolis, IN	N/A	\$100,001 - \$250,000		None (or less than \$201)
6	REIT Funding	Yes	\$1,000,001 - \$5,000,000		\$100,001 - \$1,000,000
7	Cash From US Brokerage Account	N/A	\$1,001 - \$15,000		None (or less than \$201)
8	Personal Loan to Mr. Tatum - (Cloudland Loan)	N/A	\$100,001 - \$250,000	Interest	\$5,001 - \$15,000
9	Marabou- Residential Real Estate Steamboat Springs, CO	N/A	\$500,001 - \$1,000,000		None (or less than \$201)

10	GA 529 Plan Path2College (Moderately Conservative Track)	Yes	\$15,001 - \$50,000	Dividends, Capital Gains, Interest	\$201 - \$1,000
11	Vanguard Money Market Fund	N/A	\$500,001 - \$1,000,000	Dividends, Interest	\$15,001 - \$50,000
12	USAA Money Market	N/A	\$1,001 - \$15,000	Interest	\$201 - \$1,000
13	Cash Account - US Bank	N/A	\$100,001 - \$250,000	Interest	\$1,001 - \$2,500
14	Charles Schwab ROTH IRA	N/A			
14.1	Charels Schwab US REIT	Yes	\$1,001 - \$15,000		None (or less than \$201)
14.2	Schwab Fundamental Emerging Markets Large COM	Yes	\$1,001 - \$15,000		None (or less than \$201)
14.3	Sierra Strategic Income	Yes	\$15,001 - \$50,000		None (or less than \$201)
14.4	DFA Intl Core Eqty Port Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
14.5	DFA US Large Cap Value Port Instl	Yes	\$1,001 - \$15,000		None (or less than \$201)
14.6	DFA US Micro Cap Port Instl	Yes	\$15,001 - \$50,000		None (or less than \$201)
14.7	Vanguard 500 Index Fund Admiral Shrs	Yes	\$50,001 - \$100,000	Dividends	\$201 - \$1,000
15	Charles Schwab IRA	N/A			
15.1	CVS HEALTH CORP BOND 2.25 Due 12/05/18	N/A	\$15,001 - \$50,000		None (or less than \$201)
15.2	WALGREENS BOOTS A 2.7% 19 DUE 11/18/19	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.3	BROADRIDGE FINAL CORP BOND 3.95% 20 DUE 9/01/2020	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.4	KELLOGG COMPANY 3.25% 26 DUE 4/01/2026	N/A	\$15,001 - \$50,000	Interest	\$201 - \$1,000
15.5	Alcentra Cap Corp	N/A	\$50,001 - \$100,000		None (or less than \$201)
15.6	Xtrackers Russell 1000	Yes	\$15,001 - \$50,000		None (or less than \$201)
15.7	AQR Intl Momentum Style	Yes	\$1,001 - \$15,000		None (or less than \$201)
15.8	AQR Large Cap Momentum Style I	Yes	\$1,001 - \$15,000		None (or less than \$201)
15.9	Cohen and Steers Global Infrastructure I	N/A	\$1,001 - \$15,000		None (or less than \$201)
15.10	DFA Emerging Markets Core Eqty Port Instl	Yes	\$15,001 - \$50,000		None (or less than \$201)
15.11	DFA Intl Core Equity Instl	Yes	\$50,001 - \$100,000		None (or less than \$201)

15.12	DFA Real Estate Securities Port Instl	N/A	\$1,001 - \$15,000	None (or less than \$201)
15.13	DFA US Large Cap Value Port Instl	Yes	\$15,001 - \$50,000	None (or less than \$201)
15.14	DFA US Micro Cap Port Intsl	Yes	\$15,001 - \$50,000	None (or less than \$201)
15.15	Schwab Fundamental US Large Co Index	Yes	\$50,001 - \$100,000	None (or less than \$201)
15.16	Vanguard 500 Index Fund Admiral Shrs	Yes	\$15,001 - \$50,000	None (or less than \$201)
16	Appenzeller Point LLC Residential Real Estate - Rabun County GA	N/A	\$5,000,001 - \$25,000,000	
17	Famlity Trusts #1,2, 3 - Appenzeller Point, LLC (Full value of Appenzeller Point, LLC is reflected on Line 16.)	N/A		

7. Transactions

This report has no reported **Transactions**

8. Liabilities

#	CREDITOR NAME	TYPE OF LIABILITY	AMOUNT	YEAR INCURRED	INTEREST RATE	TERM
1	Morgan Stanley Bank, NA	Liquidity Access Line	\$1,000,001 - \$5,000,000	2012	3.13%	Secured loan

9. Gifts and Travel Reimbursements

This report has no reported **Gifts and Reimbursements**

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

- This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

- The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)
- This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

- This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

- This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes, and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

- This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gift and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and the dependent children received from any one source during the reporting period.
- For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U.S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosure agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service, or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW, Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).